

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

Peerless Indemnity Insurance Company

Plaintiff,

v.

Lisa Ricchio, Bijal, Inc. d/b/a/ Shangri-La
Motel, Ashvinkumar Patel, Sima Patel, and
Clark McLean,

Defendants.

Civil Action No.: 1:16-cv-10032

**ASSENTED-TO MOTION TO EXTEND TIME
TO FILE RESPONSIVE PLEADING**

Pursuant to Fed. R. Civ. P. 6(b), Defendant Lisa Ricchio respectfully requests that the Court extend the present deadline to respond to Plaintiff Peerless Indemnity Insurance Company's Complaint until May 30, 2017. Counsel for Plaintiff assents to this motion.

Plaintiff's Complaint for Declaratory Judgement was filed on January 11, 2016. The Complaint relates to an insurance dispute between Peerless and Defendants Bijal, Inc. d/b/a Shangri-La Motel, Ashvinkumar Patel and Sima Patel (the "Shangri-La Defendants") in a related action. On March 10, 2016, Defendant Lisa Ricchio filed an Assented to Motion to Extend Time to File Responsive Pleading (Dkt. 18), which the Court granted on March 11, 2016, extending the deadline for Ms. Ricchio to respond to the Complaint to April 4, 2016. On March 29, 2016, before the deadline for Ms. Ricchio to respond to Plaintiff's Complaint for Declaratory Judgment, the Court granted a motion to stay the case pending the resolution of a related action, including any appeals (Dkt. 24). On May 2, 2017, the Court reopened the case (Dkt. 27).

Defendant Lisa Ricchio now requests a twenty-one (21) day extension of time in order to prepare a responsive pleading to account for events having occurred in the related case while this action was stayed. Plaintiff has agreed to a 21-day extension.

WHEREFORE, for the foregoing reasons, Ms. Ricchio respectfully requests that the Court grant an extension of time up to and including May 30, 2017 to file her responsive pleading.

Dated: May 8, 2017

LISA RICCHIO

By her attorneys,

/s/ Lucy Heenan Ewins

Cynthia D. Vreeland, BBO #635143

cynthia.vreeland@wilmerhale.com

Jason Liss, BBO #672902

jason.liss@wilmerhale.com

Lucy Heenan Ewins, BBO #682794

lucy.ewins@wilmerhale.com

WILMER CUTLER PICKERING

HALE and DORR LLP

60 State Street

Boston, MA 02109

(617) 526-6000

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), I hereby certify that on May 8, 2017, counsel for Ms. Ricchio conferred with counsel for Plaintiff Peerless Indemnity Insurance Company in a good faith effort to resolve or narrow the issues presented in the foregoing motion. Counsel for Plaintiff has agreed to the requested 21-day extension.

/s/ Lucy Heenan Ewins
Lucy Heenan Ewins

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document, filed through the ECF system, will be sent electronically to the registered participants of record as identified on the Notice of Electronic Filing on May 8, 2017. In addition, I hereby certify that a true and correct copy of the above document will be mailed by First Class Mail on May 8, 2017 to:

Clark McLean
39 O'Donnell Drive
Attleboro, MA 02703

/s/ Lucy Heenan Ewins
Lucy Heenan Ewins